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By Federal Express

February 2, 2011

Michael F. Perlis Direct Dial 310-556-5821 Direct Fax 310-407-6321 mperlis@stroock.com

Hon. Naomi Reice Buchwald United States District Court Southern District of New York 500 Pearl Street New York, NY 10007-1312

Re: <u>Federal Insurance Company v. SafeNet., et al., Case No. 09-CV-7863 (NRB);</u> Proposed Briefing Schedule

Dear Judge Buchwald:

Pursuant to the Court's order, counsel for Plaintiff Federal Insurance Company ("Federal") and Defendants SafeNet Inc. ("SafeNet"), Carole Argo, and Anthony Caputo have conferred by telephone and/or email on a proposed briefing schedule and propose the following:

- 1. February 4, 2011 Filing deadline for Federal's Motion for Summary Judgment;
- 2. February 25, 2011 Filing deadline for Defendants' Opposition to Federal's Motion for Summary Judgment and Defendants' Cross Motion for Summary Judgment (if any);
- 3. March 18, 2011 Filing deadline for Federal's Reply in Support of its Motion for Summary Judgment and Federal's Opposition to Defendants' Cross Motion for Summary Judgment (if filed);

The briefing schedule is approved.

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Hon. Naomi R. Buchwald February 2, 2011 Page 2

4. April 5, 2011 – Filing deadline for Defendants' Reply in Support of their Cross Motion for Summary Judgment (if filed).

Counsel for all parties respectfully request the Court's approval of the proposed briefing schedule.

Respectfully submitted,

Michael F. Perlis

cc: Ann V. Kramer, Reed Smith LLP (by Fax)

Benjamin C. Brown, Wilmer Cutler Pickering Hale & Dorr (by Fax)

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